

CHARLES B. PERKINS #126942
FLYNN, ROSE & PERKINS
59 North Santa Cruz Avenue, Suite Q
Los Gatos, California 95030
(408) 399-4566
Email: cbperk@earthlink.net

Attorney for Plaintiff
TERREL HOFFMAN

PAMELA E. COGAN (SBN 105089)
pcogan@rmkb.com
KATHRYN C. CURRY (SBN 157099)
kcurry@rmkb.com
JENNIFER A. WILLIAMS (SBN 244707)
jwilliams@rmkb.com
ROPERS, MAJESKI, KOHN & BENTLEY
1001 Marshall Street, Suite 300
Redwood City, CA 94063
Telephone: (650) 364-8200
Facsimile: (650) 780-1701

Attorneys for Defendant
LIBERTY LIFE ASSURANCE COMPANY
OF BOSTON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

TERREL HOFFMAN,) Case No. C08 00301 JF
Plaintiff,)
vs.) STIPULATION AND (PROPOSED) ORDER
LIBERTY LIFE ASSURANCE COMPANY) DISMISSING DEFENDANT SYNOPSYS, INC.
OF BOSTON; SYNOPSYS, INC.) LONG TERM DISABILITY PLAN
LONG TERM DISABILITY PLAN,)
Defendants.)

)

Plaintiff TERREL HOFFMAN and Defendant LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON ("Liberty Life") hereby stipulate as follows:

1 WHEREAS, Plaintiff has filed her Complaint in this action seeking recovery of Long-Term
2 Disability Benefits from Liberty Life and Defendant Synopsys, Inc. Long Term Disability Plan
3 ("the Plan");

4 WHEREAS, Liberty Life has filed an Answer denying liability in this action;

5 WHEREAS, notwithstanding its denial of liability, Defendant Liberty Life stipulates and
6 agrees that it will be liable for any judgment concerning payment or non-payment of Long-Term
7 Disability Benefits, interest, attorney's fees and/or costs that may result from this action, both
8 individually and as if it were the Plan;

9 WHEREAS, Liberty Life further agrees that at no time during the course of this litigation
10 will it contend that the action has been rendered defective as the result of the Plan having been
11 dismissed from this action;

12 THEREFORE, IT IS HEREBY STIPULATED, by and between the parties through their
13 respective counsel, that Defendant Synopsis, Inc. Long Term Disability Plan may be dismissed
14 from this action.

15 Dated: May 8, 2008

FLYNN, ROSE & PERKINS

16 By _____ /s/ Charles B. Perkins
17 CHARLES B. PERKINS
18 Attorney for Plaintiff
19 TERREL HOFFMAN

20 Dated: May 8, 2008

21 ROPERS, MAJESKI, KOHN & BENTLEY

22 By _____ /s/ Jennifer A. Williams
23 PAMELA E. COGAN
24 KATHRYN C. CURRY
25 JENNIFER A. WILLIAMS
26 Attorneys for Defendant
27 LIBERTY LIFE ASSURANCE
28 COMPANY OF BOSTON

1
2 ORDER
3

4 Pursuant to stipulation, it is hereby ordered that Defendant Synopsis, Inc. Long-Term
5 Disability Plan is dismissed from this action.

6 IT IS SO ORDERED.
7

Dated: May 9, 2008


THE HONORABLE JEREMY D. FOGEL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28